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Subject: Comments on Preliminary Draft CEQA Guideline Amendments for GHG

Hello

I just saw that this is a day past the deadline, but hopefully these comments can be of some use.

1. The deletion of "(F) Result in inadequate parking capacity" in the "Transportation/Traffic" section should be reversed.

Parking capacity is an important consideration for CEQA, more so in consideration of greenhouse gases. Just from the simple observation that lack of parking capacity will mean more vehicles circling around burning gas looking for a parking space it should be a consideration for project review. Please retain.

2. An area the CEQA guidelines is silent on is whether the lead agency needs to respond to comments to a Neg Dec or Mitigated Neg Dec.

Often agencies either make a judgement call for these lower determinations, or deliberately do so to avoid an EIR.

By also not having to respond to comments to those determinations, they avoid exposing their thought processes, or, in explaining their decision, realizing that a different determination would have been better. The revised Guidelines should require agencies to respond to comments to Neg Decs and Mitigated Neg Decs prior to their adoption.

3. Trees and vegetation, for the most part, take in carbon dioxide and exhale oxygen. They absorb greenhouse gases, make for a cooler surrounding that reduces the need for air conditioning, and maintain area for permeation of water into the ground.

There should be a consideration in the CEQA guidelines that a project has minimized removal of vegetation, and minimized creation of impervious areas, or that mitigation replacing those will be completed.

Thanks

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